

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

23- MC-6014

\$1,551,096.00 UNITED STATES CURRENCY,

Defendant.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon by and between the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Melanie Bailey, Assistant United States Attorney, of counsel, and Joseph S. Damelio, attorney for claimants, Vincent CATALANO Sr. and Lena CATALANO, pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the government's time to file its Verified Complaint for Civil Forfeiture against the above-named property be extended from August 4, 2023 until November 6, 2023.

The parties to this Stipulation further agree that the claimants may revoke their consent in writing to extend the time for the government to file its Verified Complaint for Civil Forfeiture against the above-named property, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.


A separate, but related administrative forfeiture proceeding commenced by the Drug Enforcement Administration (“DEA”) is currently pending with respect to the above-named property. The claimants have until the noticed deadline previously provided by the DEA to file their claim in that action.

TRINI E. ROSS
United States Attorney
Western District of New York

Dated: 8/3/2023

BY: Melanie J. Bailey
MELANIE BAILEY
Assistant United States Attorney
138 Delaware Avenue
Buffalo, New York 14202
716-843-5863
Melanie.Bailey@usdoj.gov

Dated: 8.3.23


JOSEPH S. DAMELIO, ESQ.
Attorney for Claimants
28 East Main Street, Suite 1200
Rochester, New York 14614